

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION

STANLEY LEE BROWN, JR., et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action: 6:24cv00039
	)	
THE CITY OF LYNCHBURG, et al.,	)	
	)	
Defendants.	)	

**MOTION TO DISMISS**

Defendant LPD Officers Ciarra D. Joyner, Raymond Shelton, and Keelan Wallace, by counsel, move pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure to dismiss certain claims of the Amended Complaint because they fail to state a claim upon which relief can be granted as more fully set forth in their Memorandum in Support of Motion to Dismiss the Amended Complaint.

**WHEREFORE**, Defendant LPD Officers Ciarra D. Joyner, Raymond Shelton, and Keelan Wallace respectfully move the Court to dismiss certain claims of the Amended Complaint with prejudice.

CIARRA D. JOYNER, RAYMOND SHELTON,  
and KEELAN WALLACE

By: /s/ John R. Fitzgerald  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 21<sup>st</sup> day of January, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to:

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